

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2020-163-T

**Application of Palmetto Interstate
Movers, LLC for a Class E (Household
Goods) Certificate of Public Convenience
and Necessity for Operation of Motor
Vehicle Carrier**

**MOTION FOR PERMISSION TO
PRESENT SHIPPER WITNESS
TESTIMONY BY DECLARATION**

The Commission's regulation concerning the proof required to support an application for a Certificate of Public and Convenience and Necessity for a Class E Mover of Household Goods with Statewide Authority is found in S.C. Code Regs. 103-333. Applicant submits the interests of judicial economy would be served by the Commission allowing it to present the testimony of its "shipper witness" by affidavit subject to the conditions set forth in Application of Midlands Movers, LLC, Order No. 2018-643, Docket No. 2018-268-T, and therefore so moves.

Respectfully submitted,

s/ Charles L.A. Terreni

Date: September 4, 2020

Charles L.A. Terreni
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SC Bar. No. 15235

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 20 20-163-T

Application of Palmetto Interstate
Movers, LLC for a Class E (Household
Goods) Certificate of Public
Convenience and Necessity for
Operation of Motor Vehicle Carrier

DECLARATION OF

James Haynes

Being duly deposed and sworn, Affiant states:

1. My name is James Haynes and my business address is:
2421 Broad River Rd., Columbia, SC 29210
2. I am giving this affidavit in support of the application of Palmetto Interstate Movers for a Class E Certificate of Public Convenience and Necessity with statewide authority to move household goods to points and places throughout the state of South Carolina.
3. I am employed by Flagler Real Estate LLC as a real estate agent. I have worked as a real estate agent in the Columbia area since 2014. James Haynes provides real estate services throughout the State of South Carolina.
4. I know the public needs qualified movers to transport household goods within South Carolina because I am often asked to recommend household goods movers by clients or acquaintances moving from one part of the state to another. There is always a need for qualified movers due to South Carolina's robust real estate market, especially if the movers are dependable and experienced. I would like to have another company, such as Palmetto Interstate Movers to recommend to people looking for moving services.
5. Based on my knowledge of the need for household goods movers in South Carolina, I believe the public interest would be served by granting a Certificate of Public Convenience and Necessity to Palmetto Interstate Movers

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VERIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.

Date: 8/26/2020

A handwritten signature in black ink, appearing to read "James H. [unclear]", written over a horizontal line.

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DOCKET NO. 2020-163-T
CERTIFICATE OF SERVICE

I, CARL E. BELL, hereby certify that I have, on this 4th day of September 2020, served the **Motion for Permission to Present Shipper Witness Testimony by Declaration and the Declaration of James Haynes for Palmetto Interstate Movers, LLC**, , upon the parties listed below by Electronic Mail:

Alexander W. Knowles, Counsel
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Columbia, South Carolina
September 4, 2020